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5 Attorneys for Plaintiff  
KATHLEEN A. COYNE

6 **JOHN J. SANSONE, County Counsel**  
7 **County of San Diego**  
8 **WILLIAM H. SONGER, Senior Deputy (SBN 153733)**  
9 1600 Pacific Highway, Room 355  
San Diego, California 92101-2469  
(619) 531-4749 (Telephone)  
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15 KATHLEEN A. COYNE, ) CASE NO. 08 cv00639 JLS (LSP)  
16 Plaintiff, ) PROPOSED DISCOVERY PLAN  
17 v. ) [F.R.C.P. 26(F)]  
18 COUNTY OF SAN DIEGO, a public entity, )  
19 COUNTY OF SAN DIEGO, )  
20 DEPARTMENT OF THE PUBLIC )  
21 DEFENDER, a public agency; and DOES 1- )  
22 25, inclusive, )  
23 Defendants. )

23       1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on Thursday, May 8, 2008,  
24 at the County Administration Building, 1600 Pacific Highway in San Diego, California, and was  
25 attended by:

26 Mark A. Bennett, The Law Office of Mark Alan Bennett, for Plaintiff KATHLEEN  
27 COYNE

28 William Songer, Senior Deputy, The Office of County Counsel, for Defendant THE

1 COUNTY OF SAN DIEGO.

2 2. Pre-Discovery Disclosures. The parties intend to engage in the initial disclosures  
3 pursuant to Fed. R. Civ. P. 26(a)(1) one week after the Plaintiff responds to Defendants initial  
4 discovery requests, or no later than June 16, 2008

5 3. Discovery Plan. The parties jointly propose to the court the following discovery  
6 plan:

7 Discovery will be needed on the following subjects: the facts supporting Plaintiff's claims  
8 of retaliation and discrimination as alleged in her complaint filed February 29, 2008, the damages  
9 claimed by Plaintiff, and the defenses asserted by Defendant in its answer to the complaint filed  
10 on April

11 The parties estimate that discovery will be completed by December 30, 2008.

12 In addition to written discovery available under the FRCP, the parties currently estimate  
13 the following number of depositions, not including expert depositions: Five to six depositions by  
14 Plaintiff; one to two depositions by Defendant

15 Each deposition limited to a maximum of 7 hours unless extended by agreement of  
16 parties, or order of the Court.

17 Reports from retained experts under Rule 26(a)(2) will be exchanged September 30,  
18 2008, unless ordered otherwise by the Court

19 Reports from rebuttal experts pursuant Rule 26(a)(2)(C)(ii), will be exchanged on  
20 October 30, 2008, unless otherwise ordered by the Court.

21 Supplemental Disclosures under Rule 26(e) will be due on November 30, 2008.

22 4. Other Items.

23 All Pretrial Disclosures, and objections, shall be exchanged pursuant to Rule 26(a)(3)

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1       The case should be ready for trial by March 2, 2009, and at this time is expected to take  
2 approximately seven days..

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Respectfully submitted,

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LAW OFFICE OF MARK ALAN BENNETT

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8       Dated: May 22, 2008

By:



MARK A. BENNETT,  
Attorney for Plaintiff Kathleen A. Coyne

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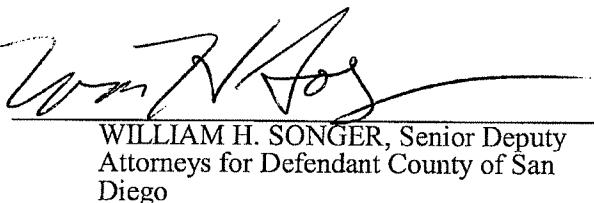
JOHN J. SANSONE, County Counsel

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14       Dated: May 22, 2008

By:



WILLIAM H. SONGER, Senior Deputy  
Attorneys for Defendant County of San  
Diego

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4 Attorneys for Plaintiff  
 5 KATHLEEN A. COYNE

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UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA

10 KATHLEEN A. COYNE,	)	CASE NO. 08 cv00639 JLS (LSP)
11 Plaintiff,	)	DECLARATION OF SERVICE BY
12 v.	)	ELECTRONIC MAIL
13 COUNTY OF SAN DIEGO, a public entity,	)	Person Served:
14 COUNTY OF SAN DIEGO,	)	William H. Songer, Esq.
15 DEPARTMENT OF THE PUBLIC	)	Date Served:
16 DEFENDER, a public agency; and DOES 1-25, inclusive,	)	May 22, 2008
17 Defendants.	)	
18	)	

19 I, the undersigned, declare under penalty of perjury that I am over the age of eighteen  
 20 years and not a party to this action. My business address is 1111 Sixth Avenue, Suite 404, San  
 Diego, California 92101. On May 22, 2008 I served the following documents:

21 **PROPOSED DISCOVERY PLAN [F.R.C.P. 26(F)]**

22 by following the procedures for electronic filing with this Court thereby causing electronic  
 23 service on the parties listed below:

24 **William H. Songer**  
 25 **COUNTY OF SAN DIEGO,**  
**OFFICE OF COUNTY COUNSEL**  
 26 **1600 Pacific Highway, Room 355**  
**San Diego, CA 92101-2469**  
 27 **619-531-4749 Telephone**  
**619-531-6005 Facsimile**  
 28 **william.songer@sdcounty.ca.gov Email**

**Attorneys for Defendants**  
**County of San Diego and**  
**County of San Diego,**  
**Department of the Public**  
**Defender**

1 I declare that I am employed in the office of a member of the bar of this court at whose  
2 direction the service was made.

3 Executed on May 22, 2008 at San Diego, California

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6 Attorney for Plaintiff Kathleen A. Coyne  
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